United States v. Daren Li, et al., Case No. CR 2:24-CR-311-RGK, and United States v.

Lu Zhang, et al., 2:23-CR-596-RGK, which:

X was previously assigned to the Honorable R. Gary Klausner;
has not been previously assigned.

The above-entitled cases may be related for the following reasons:

X the cases arise out of the same conspiracy, common scheme, transaction, series of transactions or events;
the cases involve one or more defendants in common and would entail substantial duplication of labor in pretrial, trial or sentencing proceedings if heard by different judges.

Additional explanation (if any): Please see attachment A, hereto.

Dated: March 13, 2025

Maxwell Coll

Assistant United States Attorney

## **Attachment A**

The conspiracies charged in all three cases (i.e. the above-captioned case and <u>United States v. Daren Li, et al.</u>, Case No. CR 2:24-CR-311-RGK, and <u>United States v. Lu Zhang, et al.</u>, 2:23-CR-596-RGK) involve the same scheme: The cases have identical co-conspirators, victims, bank accounts, and international financial institutions. Indeed, the defendant in this case received funds from the defendants charged in <u>United States v. Lu Zhang, et al.</u>, 2:23-CR-596-RGK, and sent funds to a defendant charged in <u>United States v. Daren Li, et al.</u>, Case No. CR 2:24-CR-311-RGK.